

# EXHIBIT 2

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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VIRGINIA L. GIUFFRE,

Plaintiff/ Counterclaim Defendant,

-V-

19-cv-03377-LAP

ALAN DERSHOWITZ,

Defendant/ Counterclaim Plaintiff.

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SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X

DAVID BOIES,

Plaintiff/ Counterclaim Defendant,

-V-

Index No.:

160874/2019

ALAN DERSHOWITZ,

Defendant/ Counterclaim Plaintiff.

-----X

DATE: December 16, 2020

TIME: 10:00 A.M.

VIRTUAL VIDEOTAPED EXAMINATION  
BEFORE TRIAL of JOHN ZEIGER, taken by MR.  
COOPER, pursuant to Subpoena, held at the  
offices of Hindy Kaplan, a Notary Public of  
the State of New York.

1 J. ZEIGER

2 A. I do not.

3 Q. Was if more than once?

4 A. Yes.

5 Q. Do you have any awareness of  
6 whether professor Dershowitz spoke at any  
7 time with Abigail Wexner?

8 A. Yes.

9 Q. Professor Dershowitz told you  
10 that he had spoken to her and she directed  
11 him to you, correct?

12 A. Correct.

13 Q. And professor Dershowitz also  
14 told you that Abigail Wexner had referred  
15 to the efforts of the Boies Schiller firm  
16 as extortion, correct?

17 MR. BOIES: Objection.

18 A. No. That's simply not true.

19 MS. PROCTOR: Join.

■ ■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

25 Q. So I take it you have no

1 J. ZEIGER

2 personal knowledge as to what was or was  
3 not said on any call between the two, if  
4 indeed one took place?

5 A. I'm afraid that any personal  
6 knowledge I had about what Mrs. Wexner said  
7 about the call would be privileged.

8 Q. So you previously said that it  
9 wasn't true. What was the basis for your  
10 statement?

11 A. Other than the privileged  
12 material, I can't go into. I know that you  
13 suggested that Alan had said in that phone  
14 call to me that there had been and  
15 extortion attempt or shake down attempt. I  
16 know Alan did not say that to me. To the  
17 contrary, none of us of ever heard of the  
18 so called shake down or extortion theory  
19 until Alan called me that day and went into  
20 the after he had talked to Mrs. Wexner. He  
21 raised it, we didn't.

■ ■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]  
■ ■ ■ [REDACTED]

1 J. ZEIGER

2 Q. And so did you -- in the  
3 conversations that you had with  
4 Mr. Dershowitz, who initiated the first  
5 call?

6 A. Mr. Dershowitz.

7 Q. And in your first conversation,  
8 did he already know about the allegations  
9 made against Leslie Wexner, to your memory?

10 A. I remember that in that first  
11 conversation he had called Les Wexner, had  
12 not reached him. Mrs. Wexner returned the  
13 call, told him to call me. He called me  
14 and started explaining the extortion theory  
15 and the information he had to back it up.

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]